



Home Office

# Guidance on the Foreign Influence Registration Scheme (FIRS): Enhanced Tier

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# Glossary of key terms

<b>FIRS</b>	Foreign Influence Registration Scheme. The Scheme introduced through Part 4 of the National Security Act 2023.
<b>Arrangement</b>	Any type of agreement, whether formal or informal. This could include a contract, memorandum of understanding (MOU) or quid pro-quo informal agreement or arrangement. Further detail is in <a href="#">chapter 3 condition 1</a> .
<b>Foreign power</b>	Has the meaning given by Section 32 of the National Security Act 2023.
<b>Specified foreign power</b>	A foreign power which has been specified through regulations under the enhanced tier of FIRS.
<b>Relevant activity</b>	A type of activity in scope of registration under the enhanced tier of FIRS.
<b>Exemption from registration</b>	A circumstance in which registration requirements do not apply. Further detail is in <a href="#">chapter 14</a> .
<b>Person</b>	An individual or other person who is not an individual, such as a company.
<b>Registrant</b>	A person required to register under FIRS.
<b>Information notice</b>	A notice issued under section 75 of the National Security Act 2023 requiring the recipient to provide information related to arrangements or activities registerable under FIRS.
<b>Political influence activities</b>	A communication, public communication or provision of money, goods or services intended to influence a political matter.

# Chapter 1: About this guidance

The Foreign Influence Registration Scheme (FIRS) is a two-tier scheme which ensures transparency of foreign influence in UK politics and provides greater assurance around the activities of certain foreign powers or entities that may pose a risk to the UK's safety and interests.

This guidance explains the requirements of the enhanced tier of FIRS. It is intended for those who may be in scope of the enhanced tier of the scheme to help determine whether, and if so how, the registration requirements apply to them.

Additional sector-specific guidance has been provided for [business](#), [media](#), [charities and civil society](#), [academia and research](#) and [defence](#) sectors.

Separate guidance has been produced for the [political influence tier](#). Where an arrangement would fall within the scope of both the political influence tier and enhanced tier, because it involves carrying out political influence activities on behalf of a specified foreign power, only registration under the enhanced tier is required.

Additional guidance will also be produced to outline the [foreign powers and foreign power-controlled entities](#) that are specified under the enhanced tier.

Guidance is also available on the [information required at registration and the public register](#), [information notices](#) and on [how the scheme is administered](#).

This guidance is intended to explain the key requirements of the FIRS scheme, contained within Part 4 of the National Security Act 2023. However, it remains the responsibility of those in scope of the scheme to comply with the legislation based on their own specific circumstances.

# Chapter 2: Introduction to the Enhanced Tier

1. The enhanced tier seeks to provide greater assurance around the activities linked to certain foreign powers, or foreign power-controlled entities, which may pose a greater risk.
2. The legislation enables the Secretary of State to specify (by laying regulations in parliament) a foreign power or foreign power-controlled entity where they consider it reasonably necessary to protect the safety or interests of the UK. The meaning of “foreign power” is set out in section 32 of the National Security Act 2023 and the conditions that need to be met for an entity to be considered a “foreign power-controlled entity” are set out in Schedule 13 of the same Act. Individuals cannot be specified on the enhanced tier.
3. The [foreign powers and foreign power-controlled entities currently specified on the enhanced tier can be found here](#). These will be kept under review and can be amended (subject to Parliamentary approval).
4. The legislation requires individuals or organisations to register where they form an arrangement with a specified foreign power or foreign power-controlled entity to carry out activities in the UK at their direction. It also requires specified foreign power-controlled entities to register activities which they carry out themselves in the UK.
5. The UK remains open to transparent engagement and cooperation with foreign powers. Those who register fully and accurately are supporting the resilience of the UK and its institutions in the face of state threats. Registration of an arrangement or activity does not in itself mean that it is necessarily illegitimate or undesirable. FIRS does not prevent any activity from taking place; providing the arrangements are transparent, related activities can proceed as normal.
6. [Chapter 3](#) gives an overview of the requirements of the enhanced tier of the scheme and how they apply to the following specific groups:
  - a. Those in arrangements with a specified foreign power or foreign power-controlled entity;
  - b. Specified foreign powers; and
  - c. Specified foreign power-controlled entities.

7. Most registrations under the enhanced tier will not be included on the public register. However, where a registered arrangement relates to the carrying out of political influence activities, certain details about the arrangement will be published. Further information is in the [guidance on the information required at registration and the public register](#).



# Chapter 3: Requirements of the Enhanced Tier

## Requirements for individuals or organisations in an arrangement with a specified foreign power or foreign power-controlled entity

8. In accordance with section 65 of the National Security Act 2023, an individual or organisation is required to register with the scheme when **all** of the below four conditions are met. It is recommended that registration is completed on the FIRS online registration portal<sup>1</sup>.

### Conditions for registration

**Condition 1:** A person makes an [arrangement](#) (whether formal or informal) with a specified foreign power or entity.

**Condition 2:** That arrangement involves a “[direction](#)” from the specified foreign power or entity.

**Condition 3:** The direction is to carry out “[relevant activities](#)” in the UK (whether by the registrant themselves, or with or through someone else).

**Condition 4:** That no [exemptions](#) apply to the arrangement or activities.

9. Under the scheme, it is the arrangement that must be registered, not each individual activity. Registrants are however required to update the information registered when there is a “material change” to the information (see [chapter 9](#)) and also to comply with any [information notices](#).

### Condition 1 – Arrangement with a specified foreign power or entity

10. An “arrangement” includes, but is not limited to:

- A formal arrangement such as a contract;
- A non-legally binding agreement such as an MOU;

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<sup>1</sup> Alternative forms of registration are also available, including for circumstances where a registration would contain sensitive details not suitable for the online registration portal.

- An order (or similar agreement) for a good or service, to be followed up with a bill or invoice;
  - An informal quid pro-quo agreement.
11. Conversations or correspondence with a specified foreign power or specified foreign power-controlled entity that do not materialise into an arrangement or agreement to carry out registerable activities in the UK do not require registration.
12. The [foreign powers and foreign power-controlled entities specified under the enhanced tier are set out here](#).
13. If an arrangement is formed with an employee of a specified foreign power or foreign power-controlled entity (when acting in this capacity), it is treated as an arrangement with a specified foreign power or entity. For example, if a person enters into an arrangement with a civil servant from a specified foreign power in relation to their role as a civil servant the condition would be met. A person entering into an arrangement with a civil servant from a specified foreign power on a matter unrelated to their role as a civil servant (for example, if they are separately the trustee of a charity) would not meet the condition.
14. Companies which are owned by, or controlled by, foreign governments (as may be the case with a state-owned enterprise) are not foreign powers by virtue of this ownership or control. Therefore, arrangements with commercial or academic entities from a country whose government has been specified do not require registration, even if these entities are state-owned or state-controlled. These arrangements will only require registration if the entity has itself been specified under the enhanced tier.
15. There are no obligations on specified foreign powers themselves (including people directly employed by specified foreign powers) to register, providing that they do not make a misrepresentation about their activities or the capacity in which they are acting. Only those who are in an arrangement with a specified foreign power or entity are required to register.

## Condition 2 - Meaning of a “direction”

16. A “direction” is an order or instruction to act to which a person is obliged or compelled, whether formally or informally, to comply.
17. The following may be examples of a “direction” from a specified foreign power or entity:

- A contract signed with a specified foreign power or entity which requires the carrying out of activities in, or having effect in, the UK;
- Coercion or other pressure by a specified foreign power or entity to carry out activities in the UK (for example, where there may be negative consequences for not carrying out the activity);
- An order placed by a specified foreign power or entity related to the provision of goods or services in the UK.

18. A **request** from a specified foreign power or entity could also be considered a direction if, for example, any of the following apply:

- the specified foreign power or entity has power or authority over the registrant;
- there is an element of control to the request;
- a benefit or reimbursement (for example, payment, compensation, reimbursement of travel expenses or subsistence, employment, business opportunities, academic honours or future favourable treatment) is to be received as a result of conformance with the request;
- there is coercion or a threat alongside the request; or
- there is a risk of negative consequences associated with a failure to conform with the request (for example, a significant loss of revenue).

19. There will need to be a link between the direction and the relevant activity (condition 3) for this condition to be met. For example, if a company receives general direction or funding from a specified foreign power or entity and chooses to carry out relevant activities in the UK not directly connected to the direction or funding then the condition would not be met.

20. The fact that a specified foreign power has the ability or right to direct the activities of an individual or organisation (as may be the case within the legal system of some countries) does not trigger a registration requirement. Only where activities are actually directed will this condition be met.

21. Whilst funding from a specified foreign power or entity does not, in itself, constitute a direction, it may form part of a direction if it has conditions attached for it to be used in a particular way. Unrestricted grants which give the grantee the autonomy to use the funding in a way which they see fit are not considered a direction. Where an individual or organisation applies for a form of funding (for example, a grant) from a specified foreign power or entity, and that grant is approved without specific conditions being placed on the activities, this would not in itself constitute a direction.

22. Where funding is provided in general support of the work of an organisation, without conditions that it is to be used in a particular way, this would not require

registration. Similarly, where funding is provided by a specified foreign power or entity in support of a project or initiative that is happening anyway, and that funding does not influence how the project or initiative is carried out, that does not constitute a direction.

23. Ownership, or part-ownership of an organisation or company by a specified foreign power, does not necessarily mean that activities of such entities are directed by the foreign power. Entities which are owned by specified foreign powers should see [chapter 10](#).
24. An organisation which receives an overall direction from a specified foreign power may be required to register, where the carrying out of relevant activities in the UK form an inevitable part of the direction. For example, cultural, political, language or economic institutes with links to a specified foreign power may be required to register if the specified foreign power provides overall direction to the institute to pursue certain objectives, and relevant activities in the UK (condition 3) are an inevitable part of fulfilling their objectives. In these cases, the institute is likely to make a single registration related to their overall arrangement with the foreign power, which it updates if the nature of the arrangement or activities change (please see [chapter 9](#)).

### Condition 3 - Definition of “relevant activities”

25. The default is that “relevant activities” include all activities in the UK. This includes, but is not limited to, commercial activities, research activities and the provision of goods and services (except where this is [exempt](#)).
26. The scope of “relevant activities” may, however, be amended by the Secretary of State, so that arrangements with different specified foreign powers or entities require registration of different types of activities. Please see the [guidance for each relevant country](#) for further details on this.
27. Registration is only required where activity is carried out in the UK. It does not matter whether the arrangement is made in the UK or overseas, or where the parties of the arrangement are based. Where an activity starts abroad, but has effect in the UK, this may be in scope of registration requirements. For example:
- A post on a social media page which is targeted at individuals in the UK, even if it is posted by an individual overseas.
  - The transfer of funds from an individual abroad to an individual in the UK or vice versa.
28. However, where an activity takes place entirely abroad (for example, a meeting with a UK Minister during a visit overseas), this is not in scope of registration

requirements. The Republic of Ireland, Channel Islands, Isle of Man and British Overseas Territories count as “abroad” for these purposes.

29. “Relevant activities” only require registration if conditions 1, 2 and 4 are also met, meaning that the activities are being directed by a specified foreign power or foreign power-controlled entity, and no exemptions apply. Activities carried out in partnership with entities that have not been specified do not require registration.

#### Condition 4 - Exemptions from the enhanced tier

30. There are a number of exemptions from the requirement to register arrangements or activities under the enhanced tier (these are set out in Schedule 15 of the National Security Act 2023 or in regulations):

- Anyone acting as part of an arrangement to which a UK Crown Body is a party (for example, those in a multilateral arrangement with both the UK government and specified foreign governments);
- Individuals acting for a foreign power in their official capacity as employees, for example foreign diplomats based in the UK;
- Family members (including unmarried partners) of staff of diplomatic missions, consular posts or permanent missions of UK-based international organisations, where they are supporting the official activities of their family member;
- Lawyers, in their provision of legal services to foreign powers (for example, those representing specified foreign powers in a court case);
- Those providing goods or services which are reasonably necessary to the functioning of a diplomatic mission, consular post or permanent mission of a UK-based international organisation;
- Anyone acting as part of an arrangement to which a UK public body is a party;
- Those carrying out activities related to a funded education arrangement (for example, a scholarship);
- Government administrative and technical services (for example, activities related to the issue of passports or visas).

31. For further detail on exemptions, see [chapter 14](#) of this guidance.

#### Requirements for specified foreign powers

32. Specified **foreign powers** do not need to register relevant activities which they carry out themselves, providing that those working for them do not make a

misrepresentation about their activities or the capacity in which they are acting when carrying out those activities. Where the activity involves a misrepresentation the activity must be registered.

## Requirements for specified foreign power-controlled entities

33. Specified foreign power-controlled entities (FPCEs) are required to register prior to carrying out any “relevant activities” in the UK. It is an offence for a specified FPCE to carry out relevant activities unless they have registered beforehand.

## Chapter 4: Timing of registration

34. In accordance with section 65 of the National Security Act 2023, registration of “foreign activity arrangements” must be completed within 10 calendar days, beginning with the day on which the arrangement is made, and prior to any activities pursuant to the arrangement being carried out (otherwise an offence will be committed). For example, if an arrangement is made on 1<sup>st</sup> January, it must be registered by 10<sup>th</sup> January. If any activities are to take place between 1<sup>st</sup> and 10<sup>th</sup> January, the arrangement must be registered prior to those activities taking place. Different timescales apply to the [political influence tier](#).
35. In the case of a contract or other written agreement which is signed by both parties, the day on which the arrangement is made refers to the date on which the final party signs and returns the contract or agreement.
36. In the case of an informal verbal agreement, the day on which the arrangement is made refers to the date on which the agreement was made to carry out an activity in the UK. Conversations or correspondence which do not materialise into an agreement to carry out activities in the UK are not registerable arrangements.
37. The scheme’s requirements come into force on 1<sup>st</sup> July 2025. Those that are in ongoing arrangements that commenced prior to that date should see the [guidance on pre-existing arrangements](#). There is no requirement to register previous arrangements that ended before 1<sup>st</sup> July 2025.
38. Where an arrangement does not initially meet the conditions for registration, but subsequently becomes registerable, registration must be completed within 10 calendar days of the arrangement becoming registerable and ahead of registerable activity taking place. For example, where an arrangement with a specified foreign power initially only relates to activities taking place outside of the UK, but subsequently evolves to include the carrying out of relevant activities in the UK, it must be registered within 10 days of the agreement to expand the arrangement to include activities in the UK or, if sooner, before the activity in the UK takes place.
39. Registration is deemed to be completed as soon as it is submitted. There is no need to wait for any further communication or approval from the Government before commencing the activities referred to at registration. However, where a registration is submitted through the online registration portal, a confirmation email will be sent to the email address associated with the registrant’s FIRS account at the time of submitting the registration.

# Chapter 5: Who the registration requirements fall upon

## Registerable arrangements

40. Where the conditions for registration under the enhanced tier are met, it is the individual or organisation which is in the arrangement with the specified foreign power or entity that is required to register (referred to as “P” in the National Security Act 2023).
41. The individual or organisation in the registerable arrangement may entrust a third party to complete the registration form if they wish; however that does not transfer the legal responsibility for compliance.
42. Where there are multiple direct parties to a registerable arrangement, each party will need to register separately. For example, where two separate organisations are both parties to an arrangement with a specified foreign power, they will both need to register separately. However, this does not mean that multiple employees involved in a registerable arrangement for a single organisation will all have to register; a single registration made by the organisation will suffice in these cases.
43. Where an organisation makes an arrangement with a specified foreign power or entity, it is the organisation (rather than their employees) which has the legal responsibility to register. The registration form may be completed by any employee within the organisation who is authorised to do so. In the event of non-compliance, the criminal liability will fall upon the organisation rather than the individual who completed the registration form (although see sections 35 and 81(1) of the National Security Act 2023 which provide that an officer of a company could be liable for the actions of the company in some circumstances). Please see [chapter 12](#) for further details. Employees of the organisation should see [chapter 6](#).
44. Where an employee of an organisation makes an arrangement with a foreign power that is outside of the scope of their employment, it is the employee who has the legal responsibility to register as an individual. For example:
  - A company employee who is also a blogger in their private capacity may have to register if they make an arrangement which relates to their blogging activities;



- An academic employed by a university may have to register if they make an arrangement which is related to their own private research or journal publications, rather than those of the role that they play for the university as a whole.

## Registerable activities by specified foreign power-controlled entities

45. Where a specified foreign power-controlled entity (FCPE) is itself carrying out registerable activities in the UK, the responsibility to register lies with the specified FPCE. The registration form may be completed by any employee of the FPCE who is authorised to do so. In the event of non-compliance, the criminal liability will fall upon the entity rather than the individual who completed the registration form (although see sections 81 and 35 of the National Security Act 2023 which provide that an officer of a company could be liable for the actions of the company in some circumstances).
46. Alternatively, the specified FPCE may entrust a third party to complete the registration form if it wishes; however that does not transfer the legal responsibility for compliance.
47. If multiple employees of a specified FPCE are involved in a relevant activity, a single registration undertaken by the entity will suffice; individual employees are not required to each register separately. However, employees of the entity should see [chapter 6](#).

# Chapter 6: Guidance for employees, subcontractors and other persons carrying out activities in scope of FIRS

## Registerable arrangements

48. The responsibility to register lies with the person that makes the arrangement with the specified foreign power or foreign power-controlled entity (FPCE).
49. However, where an arrangement has not been registered, it is an offence for anyone acting under the arrangement to carry out relevant activities pursuant to that arrangement (see section 67(2) and (3) of the National Security Act 2023).
50. Employees and subcontractors who have been tasked with carrying out an activity pursuant to a registerable arrangement should first take reasonable steps to check with their employer or contracting body that they have registered the arrangement or activity. There are safeguards in the legislation where the person has taken all reasonable steps open to them to check whether or not the arrangement is registered and believed that it was (see section 67(4) of the National Security Act 2023).
51. Any employees or subcontractors that believe that inaccurate or misleading information has been provided at registration should contact the registrant to request that they correct or update the information provided at registration. They should not proceed with activities until this information has been updated or corrected.
52. There is no specific duty on any employees, subcontractors or other persons carrying out activities to proactively carry out due diligence into who is directing the activity. The key is whether the people carrying out the activities have knowledge or information available to them which suggests that they are acting pursuant to a registerable arrangement (see section 67(3) of the National Security Act 2023) – and if they have such knowledge or information, then they should check that the arrangement is registered (see section 67(4)).
53. Employees and subcontractors would not commit any offence, if they had no way of knowing that they were acting pursuant to a registerable arrangement; for example where:

- the employees' or subcontractors' activities are solely commercial, academic or charitable in nature, with no information to suggest that the activities have been directed by a specified foreign power or entity;
- they know that the entity with whom they are working is state-owned, state-controlled or otherwise closely linked to the state, but have no reason to know that the state has actually directed the activities that they are carrying out;
- the objectives that they are seeking to achieve through their activities are not strategic or political objectives of the state, but rather the objectives of the specific entity that they are working with, and they have no information to suggest that the state has directed these activities.

54. Employees and subcontractors carrying out activities which are incidental to activities in scope of registration do not need to take any action to comply with FIRS. For example, where an organisation has been directed to organise an event, those providing cleaning services in preparation for the event do not need to take any action to comply with FIRS. For their activities to be in scope, their activities would need to form an inevitable part of the "direction" from the specified foreign power, to the extent that the objectives of the specified foreign power could not be achieved without their activities.

55. Different provisions exist in relation to employees and subcontractors carrying out activities registerable under the political influence tier of the scheme. Employees and subcontractors will therefore need to establish which tier of the scheme the activity they are carrying out relates to, if they believe that the activity forms part of a registerable arrangement.

**Case study 1 (those involved in the activities are required to check whether the arrangement is registered):** A PR agency enters into an arrangement with the Ministry of Investment of Country A, which has been specified under the enhanced tier, to promote Country A to potential UK investors. The PR agency then invites a number of existing investors to present at a conference in the UK. The PR agency sends them an advanced copy of the programme, which clearly states that they have worked with the Ministry of Economic Affairs in organising the conference.

The PR agency is required to register. As the PR agency has clearly declared their arrangement with the Ministry of Investment of Country A, and the activities clearly seek to further the interests of the Ministry, the existing investors who are presenting at the conference reasonably ought to know that they are acting pursuant to a registerable arrangement, so should check that the arrangement is registered prior to delivering their presentation.

**Case study 2 (those involved in the activities have no reason to believe that they are acting pursuant to a registerable arrangement):** An electric car company is owned by the Government of Country B, which has been specified under the enhanced tier. The Government of Country B directs the company to prioritise the UK market for sale of the cars. The car company then enters into an arrangement with a UK car dealership to sell their cars to UK drivers.

The electric car company is required to register. The UK car dealership knows that the company is owned by the Government of Country B, however their activities are simply furthering the commercial interests of the car company and they have no information to suggest that they have been directed by the Government of Country B. They may therefore proceed with their activities without taking action to comply with FIRS.

## **Registerable activities by specified foreign power-controlled entities**

56. Where a specified foreign power-controlled entity is carrying out relevant activities themselves, the responsibility to register lies with the entity itself rather than its individual employees.
57. However, employees of the entity must not carry out relevant activities unless they have been registered by their employer beforehand.

# Chapter 7: Examples of arrangements and activities requiring (and not requiring) registration under the enhanced tier

For the purpose of these examples, it is assumed that all activities constitute “relevant activities” and therefore condition 3 is met in all cases.

**Example 1 (registration required) (direction from a specified foreign power-controlled entity):** The Ministry for News and Propaganda of Country A has been specified under the enhanced tier. The Ministry contacts an influencer in the UK, requesting that they produce content for upload to video sharing platforms expressing support for the Government of Country A, and rebutting claims that it is repressing its people. The influencer produces the videos and is offered vouchers as a reward.

**Condition 1** is met as the Ministry for News and Propaganda of Country A, with whom the influencer is in an arrangement, is a specified foreign power.

**Condition 2** is met as the Ministry makes a request of the influencer, offering them a reward in return.

**Condition 3** is met as all activities (including the production of videos) constitute “relevant activities”.

**Condition 4** is met as no exemptions apply.

**The influencer** is therefore required to register.

**Example 2 (registration required) (direction from a specified foreign power):** The Foreign Ministry of Country B has been specified on the enhanced tier. A UK-based consular post, which is part of the Foreign Ministry, contracts a UK printing and reprographics firm to produce leaflets advertising Country B as a tourist destination.

**Condition 1** is met as the Foreign Ministry of Country B (and the consular post falling beneath it), with whom the UK printing and reprographics firm is in an arrangement, is a specified foreign power.

**Condition 2** is met as a contract is signed between the consular post and the printing and reprographic firm.

**Condition 3** is met as all activities (including the printing of leaflets) constitute “relevant activities”.

**Condition 4** is met as no exemptions apply. The printing of tourism promotion leaflets is not an activity that is reasonably necessary to support the efficient functioning of a diplomatic mission.

**The printing and reprographics firm** is therefore required to register.

**Example 3 (registration required) (direction from a specified foreign power):** An airline is approached by the Civil Aviation Authority of Country C, which has been specified on the enhanced tier. The Civil Aviation Authority of Country C requests that the airline increases the number of flights between the UK and Country C and offers them priority landing slots and VIP access to facilities in the airports in Country C. As a result, the airline adds an additional route from the UK to a city within Country C.

**Condition 1** is met as the Civil Aviation Authority of Country C, with whom the airline is in an arrangement, is a specified foreign power.

**Condition 2** is met as the Civil Aviation Authority of Country C makes a request of the airline, offering them a reward in return for increasing the number of flights between the UK and Country C.

**Condition 3** is met as all activities (including the operation of the additional route from the UK) constitute “relevant activities”

**Condition 4** is met as no exemptions apply.

**The airline** is therefore required to register.

**Example 4 (registration required) (direction from a specified foreign power):**

The projects of a UK-based company are directly funded and supported by the Government of Country D, which has been specified on the enhanced tier. Government officials of Country D request the company to target a proportion of the funding at acquiring specialist expertise for future projects and direct the company to hold a series of networking and collaboration events in the UK to raise their profile with UK industry specialists.

**Condition 1** is met as the Government of Country D, with whom the company is in an arrangement, is a specified foreign power.

**Condition 2** is met as the company is provided with funding and directed to use it to carry out specific activities.

**Condition 3** is met as all activities (including the holding of the events) constitute “relevant activities”.

**Condition 4** is met as no exemptions apply.

**The company** is therefore required to register.

**Example 5 (registration required) (direction from a specified foreign power):**

The Department of Cultural Affairs (DCA) of Country E has been specified under the enhanced tier. An official working for the DCA in the UK Embassy of Country E meets with a high-profile entrepreneur in the UK. They offer him money to actively promote a number of cultural programmes being run by UK academic institutions. The entrepreneur promotes the programmes at high-profile business events and accepts the money as reimbursement.

**Condition 1** is met as the DCA, with whom the entrepreneur is in an arrangement, is a specified foreign power.

**Condition 2** is met as the entrepreneur is offered money to carry out activities.

**Condition 3** is met as all activities (including the promotion of cultural programmes) constitute a “relevant activities”.

**Condition 4** is met as no exemptions apply.

**The entrepreneur** is therefore required to register.

**Example 6 (registration required) (direction from a specified foreign power):**

The Ministry of Security & Defence of Country F has been specified under the enhanced tier. An official of the Ministry of Security & Defence meets with a businessperson who is due to attend a conference in the UK. The official requests the businessperson to use their UK network to arrange for a number of experts, who are attending the conference, to be approached and invited to present at a future event. The businessperson complies with the request as, in return, they are offered permanent residency status in Country F.

**Condition 1** is met as the Ministry of Security & Defence, with whom the businessperson is in an arrangement, is a specified foreign power.

**Condition 2** is met as the Ministry of Security & Defence makes a request of the businessperson, offering them permanent residency status in Country F as a reward.

**Condition 3** is met as all activities (including the contact made with the experts and invitation to a future event) constitute “relevant activities”.

**Condition 4** is met as no exemptions apply.

**The businessperson** is therefore required to register.

**Example 7 (registration required) (direction from a specified foreign power):**

The Government of Country G has been specified on the enhanced tier. The laws of Country G enable the government to require its nationals to carry out activities for the state with possible prison sentences for those who do not comply. A government official approaches a national of the country who is about to travel to the UK for study purposes and requests that they organise a demonstration in support of the Government of Country G. The national complies with the request and organises the demonstration.

**Condition 1** is met as the Government of Country G, with whom the national is in an arrangement, is a specified foreign power.

**Condition 2** is met as the Government of Country G makes a request of one of their nationals, and the national is under a legal obligation to comply.

**Condition 3** is met as all activities (including the organisation of a demonstration) constitutes “relevant activities”.

**Condition 4** is met as no exemptions apply.

**The national** of Country G is therefore required to register.



**Example 8 (registration required) (direction from a specified foreign power):** A human rights organisation has invited an opposition politician from Country H to deliver a speech in the UK. The Government of Country H has been specified under the enhanced tier, and employees of the human rights organisation have historically faced harassment for their work in Country H which the Government of Country H has not condemned. The UK-based embassy of Country H summons the head of the human rights organisation and tells him to cancel the speech by the opposition politician, suggesting that if he does not, there will be consequences for the organisation and its staff. The head of the organisation is concerned that failure to comply may lead to further harassment against their staff in country H, so he cancels the speech.

**Condition 1** is met as the embassy of Country H, with whom the human rights organisation is in an arrangement, is part of a government which has been specified under the enhanced tier.

**Condition 2** is met as the embassy tells the human rights organisation to act, and suggests that there are potential consequences for the organisation's staff in Country H if the speech goes ahead.

**Condition 3** is met as all activities (including the cancelling of a speech) constitute "relevant activities".

**Condition 4** is met as no exemptions apply.

The **human rights organisation** is therefore required to register.

**Example 9 (registration required) (direction from an agency or authority of a specified foreign government):** The whole of the Government of Country I has been specified under the enhanced tier, including all agencies and authorities of the Government. An agency sits under the Ministry for Tourism and is responsible for promoting tourism to the country. The agency enters into a contract with a consultant, who agrees to host an event in the UK which promotes country A as a tourist destination to UK nationals.

**Condition 1** is met as the agency, with whom the consultant is in an arrangement, has been specified under the enhanced tier.

**Condition 2** is met as the consultant enters into a contract with a specified foreign power (the agency).

**Condition 3** is met as all activities (including the hosting of a tourism-promotion event) constitutes “relevant activities”.

**Condition 4** is met as no exemptions apply.

The **consultant** is therefore required to register.

**Example 10 (registration not required) (no direction from a specified foreign power):** The Government of Country J has been specified on the enhanced tier. A national from Country J, who has no links to the Government, engages with academics at a UK university, who subsequently agree to undertake a research project in the UK.

**Condition 1** is **not** met as the national is independent of the specified government.

**Condition 2** is **not** met as there is no direction from the specified foreign government.

**Condition 3** is met as all activities (including research activities) constitute “relevant activities”.

**Condition 4** is met as no exemptions apply.

As conditions 1 and 2 are not met, neither the national of country J nor the UK academics are required to register. The specification of a foreign government does **not** mean that all activities of the nationals or entities from that country require registration.

**Example 11 (registration not required) (no direction from a specified foreign power):** The Government of Country K has been specified under the enhanced tier. A UK-based charity receives frequent donations from the Government of Country K. Although the donations support the work and cause of the charity, it is not being directed to spend this funding in a particular way.

**Condition 1** is met as the Government of Country K, with whom the charity is in an arrangement, is a specified foreign power.

**Condition 2** is **not** met as the charity is not directed to spend the funding received to carry out specific activities.

**Condition 3** is met as all activities (including charitable activities) constitute “relevant activities”.

**Condition 4** is met as no exemptions apply.

As condition 2 is not met, the charity is **not** required to register.

**Example 12 (registration not required) (no direction from a specified foreign power):** The Government of Country L has been specified under the enhanced tier. A UK company is in a contract with a state-owned enterprise of country L. Whilst the political and legal system of the country gives the Government the right to control the state-owned enterprise, their day-to-day operation is independent of the government and their activities are solely commercial in nature. As part of the contract, the UK company supplies components which are used to manufacture the products of the state-owned enterprise.

**Condition 1** is **not** met as, whilst the UK company is in an arrangement with a state-owned enterprise, that state-owned enterprise is not a specified entity or part of the specified foreign power.

**Condition 2** is **not** met as, whilst a contract is in place with a state-owned enterprise, there is no direction from a specified foreign power.

**Condition 3** is met as all activities (including the supply of components) constitute “relevant activities”.

**Condition 4** is met as no exemptions apply.

As conditions 1 & 2 are not met, the UK company is **not** required to register.

# Chapter 8: Information required at registration

58. The information required at registration (as provided for in regulations) is set out in the [guidance about the information required at registration and the public register](#). The information which is required will depend on the exact circumstances of the registrant, the arrangement and the activities being carried out. The online registration form will direct registrants to provide the relevant information according to their own circumstances.

59. The following information will be required in all cases:

- A description of the nature and form of the arrangement;
- The name of the specified foreign power or foreign power-controlled entity directing the activity;
- A description of the activities to be undertaken, including their nature, purpose and any sought outcomes;
- Details of the start and end dates of the activities;
- Details of the individual or organisation who will carry out the activities; and
- Details related to the registrant (including address and contact details).

## Chapter 9: Requirements to update registration when there is a “material change”

60. In accordance with section 74(5) of the National Security Act 2023, where there is a material change to information registered under the scheme, the information must be updated within 14 calendar days, beginning with the day on which the change takes effect. For example, if the change takes effect on 1<sup>st</sup> January, the change must be registered by 14<sup>th</sup> January.

61. However, this requirement does not necessarily mean that registrations need to be updated every time new activity is arranged or carried out. Where an activity is repeated and conducted in the same way and for the same purpose as the original activity registered, that does not trigger a requirement to register a material change.

62. The following are examples of what may constitute a material change.

- A change in the form of the arrangement, for example where an informal quid pro quo arrangement is formalised through a contract.
- A new type of activity being carried out. For example, where a registered arrangement originally only related to research activity and now it relates to commercial activity.
- A change in the individual or organisation which is carrying out the activities (this does not include where a new employee of the same organisation becomes involved in the activities).
- A substantial change in the anticipated start or end date of activities (for example, a significant delay or extension to activities, when considering the overall length of the activities).
- A substantive change to the purpose of the activities.
- An additional specified foreign power from a different country becomes a party to the arrangement.

63. Where a new activity could reasonably be inferred from the information provided at registration even if it is not explicitly mentioned, this would not constitute a material change. For example, if the activities are fulfilling an order for a good or service, activities such as the issue of an invoice or receipt, or communications with the client to clarify their needs with regard to the order, could reasonably be inferred without being explicitly mentioned.

64. The purpose of the requirement to update information when there is a material change is to ensure that information remains accurate and complete. Changes to a registerable arrangement or activities would therefore not require the registrant to update a material change, if the information provided at registration still remains accurate and complete. For example, minor changes to the details of the arrangement do not trigger a requirement to update a material change, if the overarching description of the arrangement provided at registration remains accurate.

## Examples of compliance

### **Case 1 (based on example 2 of [chapter 7](#)) (one-off registration with no updates):**

The printing and reprographics firm registers their arrangement with the consular post, providing the following information:

**Nature and form of the arrangement:** A contract with the consular post of country B in the UK.

**Activities to be carried out:** The printing of leaflets advertising country B as a tourist destination.

The printing and reprographics firm then carries out the following activities:

**The firm emails the consular post to confirm the quantity and size of the leaflets required.** As this email forms part of the activities mentioned at registration (the printing of leaflets), no further action is required to comply with FIRS.

**The firm prints off a sample leaflet and delivers it to the consular post.** This activity forms part of the activities mentioned at registration (the printing of leaflets), no further action is required to comply with FIRS.

**The firm then prints all of the leaflets requested as part of the order.** This activity forms part of the activities mentioned at registration (the printing of leaflets), no further action is required to comply with FIRS.

**The firm then issues an invoice to the consular post.** The issue of an invoice could reasonably be inferred by the information provided at registration, given it would be an expected aspect of a commercial arrangement.

In this example, a one-off registration amounts to compliance, with no updates required to the information provided.

**Case 2 (based on example 5 of [chapter 7](#)) (updates to registration required):**

The entrepreneur registers their arrangement with the Department of Cultural Affairs of Country E, providing the following information:

**Nature and form of the arrangement:** An informal arrangement with payment to be provided upon completion of activities.

**Activities to be carried out:** Promotion of cultural programmes being run by UK academic institutions, including through social media and physical publications. The cultural programmes are to include culinary classes, language immersion events, traditional art displays and testimonies from recent visitors to country E.

**Persons to carry out the activities:** Myself.

The entrepreneur then carries out the following activities.

**The entrepreneur shares a post on social media about a cultural programme being held by a UK university.** As this activity falls part of the activities mentioned at registration (promotion of cultural programmes), no further action is required to comply with FIRS.

**The entrepreneur and the Department of Cultural Affairs then agree to formalise the arrangement and sign a contract. The entrepreneur also asks his son, who has a greater technical expertise, to produce a series of videos advertising the cultural programme.** As this represents a change in the nature and form of the arrangement and a change to the persons carrying out the activities, the entrepreneur must update the information at registration.

**The entrepreneur then attends a conference at which he hands out leaflets advertising the cultural programme.** As this activity falls part of the activities mentioned at registration (promotion of cultural programmes), no further action is required to comply with FIRS.

**The entrepreneur is then asked by the Department of Cultural Affairs to carry out a piece of research into the understanding of the culture of country E among UK nationals.** As this represents a new activity which has not been mentioned at registration, the entrepreneur must update the registration and provide details of the research to be undertaken.

In this example, the entrepreneur is required to update the information provided at registration at appropriate points.

# Chapter 10: Guidance for state-owned enterprises from countries whose government has been specified

65. This section is for state-owned enterprises and other similar entities (for example, sovereign wealth funds) from countries whose government has been specified under the enhanced tier. Those working in partnerships with state-owned enterprises from these countries should see [chapter 11](#).

66. Ownership, funding or another means of control by a specified foreign power does not in itself trigger a registration requirement on the state-owned enterprise, nor does it make the state-owned enterprise a part of the specified foreign power. Only where a state-owned enterprise is, itself, specified in regulations, or where it is directed by a specified foreign power to carry out, or arrange, relevant activities in the UK will it be required to register.

67. Where employees of a specified foreign power (for example, civil servants) form part of the board of the company, and the board (as a whole) directs the enterprise to carry out relevant activities in the UK:

- Registration is not required if those relevant activities are solely in the state-owned enterprise's own commercial interests and there is no explicit direction from the specified foreign power.
- Registration may be required if those relevant activities are principally to further the interests of the foreign power.
- Registration may be required if the political system of the country of the state-owned enterprise allows the Government effective control over the board (for example, if the Government members of the board can override the votes of the other members of the board) and the Government actually exercises this control to direct activities in the UK or the threat of them exercising this control influences the decision of the board.

68. Where a state-owned enterprise carries out activities which it determines itself, with no direction from a specified foreign power, registration is not required. The only exception would be if the state-owned enterprise was itself specified in regulations under the enhanced tier.



**Example 13 (registration required) (direction from a specified foreign power via the company board):**

The governing party of Country M has been specified under the enhanced tier, with all activities constituting relevant activities. A state-owned enterprise from the country is involved in the manufacture of telecommunications equipment. Two of the ten members of the board are employed by the governing party and the governance structure of the enterprise allows them to override the votes of other board members. The two board members from the Government, with agreement from the rest of the board, direct the company to pursue a partnership with a UK company involved in the installation of fibre optic cables. The governing party of Country M believes that, by doing so, it may be able to make the case for future involvement by businesses from the country in UK large-scale infrastructure projects. The state-owned enterprise then agrees to collaborate with the UK company by providing extra resource to install the cables.

**Condition 1** is met as the Government of Country M, with whom the state-owned enterprise is in an arrangement, is a specified foreign power.

**Condition 2** is met as the members of the board from the specified foreign power direct the company and the activities are to further the interests of the specified foreign power. Whilst a direction from the board doesn't in itself constitute a direction from the specified foreign power, in this circumstance the direction is specifically from the board members representing the governing party, whose views and votes hold greater weight than the other board members.

**Condition 3** is met as the forming of the partnership with the UK company and the installation of fibre optic cables constitute relevant activities.

**Condition 4** is met as no exemptions apply.

The state-owned enterprise is therefore required to register.

The UK company is not required to register as they are not in a direct arrangement with the Government of Country M. However, if they had reason to believe that they were acting pursuant to a registerable arrangement, then they would have to check that the state-owned enterprise had registered the arrangement.

**Example 14 (registration not required) (no direction from a specified foreign power):** The Government of Country N has been specified under the enhanced tier, with all activities constituting relevant activities. A state-owned enterprise from the country is involved in the manufacture of telecommunications equipment and two out of the ten members of the board are from the Government. An employee of the enterprise identifies that one of the printers in their UK office is defective and therefore buys a new one.

**Condition 1** is met as the Government of Country N, which owns the company and therefore is in an arrangement with it, is a specified foreign power.

**Condition 2** is **not** met as, whilst members of the Government sit on the board of the company, the requirement for a new printer is identified by an employee of the company and there is no involvement from the Government.

**Condition 3** is met as the purchase of a new printer constitutes a "relevant activity".

**Condition 4** is met as no exemptions apply.

As condition 2 is not met, the state-owned enterprise is **not** required to register.

# Chapter 11: Guidance for those working with state-owned enterprises and other entities with close links to specified foreign powers

69. Where a foreign power is specified, that does not mean that all entities which are controlled by that foreign power are also specified. These entities would only be considered specified if they are named as a specified foreign power-controlled entity.
70. Therefore, those carrying out relevant activities in the UK at the direction of foreign-power controlled entities (for example, state-owned enterprises or sovereign wealth funds) would only have to register if the entities were themselves specified.
71. Those acting pursuant to an arrangement between a specified foreign power and a state-owned enterprise should see [chapter 6](#).
72. Foreign power-controlled entities from countries whose government has been specified should see [chapter 10](#).

**Example 15 (registration not required) (company is not part of a specified foreign government):** The whole of the Government of Country O has been specified under the enhanced tier, with all activities constituting relevant activities. The political system of the country means that the Government has the right to control any entities in the country, regardless of their activities. Employees of a coffee production company, acting without direction from the Government of Country O, identify a consultant to help market their products in the UK. The consultant signs a contract with them and agrees to host a tasting event in the UK promoting the company's coffee beans.

With regard to the coffee production company:

**Condition 1** is **not** met as, whilst the Government of the country has been specified, the coffee production company is not in an arrangement with the Government.

**Condition 2** is **not** met as, whilst the Government has the right to direct the company's activities, in this circumstance it is not actually directing the company's activities.

**Condition 3** is met as all activities (including engaging with a consultant) constitute "relevant activities".

**Condition 4** is met as no exemptions apply.

With regard to the consultant:

**Condition 1** is **not** met as the company, with whom the consultant is in an arrangement, has not been specified. Whilst the specified government has the right to effectively control the company, the company has not been specified itself.

**Condition 2** is **not** met as the direction comes from the coffee production company, not the specified government.

**Condition 3** is met as all activities (including marketing coffee beans) constitute "relevant activities".

**Condition 4** is met as no exemptions apply.

As conditions 1 and 2 are not met, neither the coffee production company nor the consultant are required to register.

**Example 16 (registration required) (state-owned enterprise is itself a specified entity):** A state-owned enterprise from Country P has been specified, as its activities pose a risk to UK safety or interests, with all activities constituting "relevant activities". The state-owned enterprise enters into a contract with a consultant, who agrees to host an event marketing the products of the enterprise to a UK audience.

**Condition 1** is met as the state-owned enterprise, with whom the consultant is in an arrangement, is a specified foreign power-controlled entity.

**Condition 2** is met as the consultant enters into a contract with a specified foreign power-controlled entity.

**Condition 3** is met as all activities (including the marketing of products to a UK audience) constitute "relevant activities".

**Condition 4** is met as no exemptions apply.

The **consultant** is therefore required to register.

## Chapter 12: Offences and penalties

73. The following offences under the enhanced tier are punishable by up to 5 years imprisonment and/or a fine:

- Failure to register a registerable arrangement (section 65(5) of the National Security Act 2023);
- Carrying out relevant activities, or arranging for others to carry out these activities, pursuant to a registerable arrangement, where registration requirements have not been met (section 67(2) and (3));
- Carrying out relevant activities for a specified foreign power-controlled entity without prior registration (section 68(9));
- Carrying out relevant activities for a specified foreign power while acting under a misrepresentation and without prior registration (section 68(10));
- Failure to update a registration within 14 days where there is a material change to the information registered (section 74(8));
- Failure to comply with an information notice (section 75(8));
- The provision of false, inaccurate or misleading information (section 77);
- Carrying out relevant activities, or arranging for others to carry out these activities, pursuant to a registerable arrangement, where false, inaccurate or misleading information has been provided (section 78(1)).

74. The offence under section 65(5) only applies where the person required to register knows, or having regard to other matters known to them reasonably ought to know, that the arrangement is of a kind that requires registration. Where the person could not have known that this was the case (for example, if they could not have known that the person with whom they were in the arrangement was part of a specified foreign power), then they will not commit the offence.

75. In court proceedings related to the offences under sections 67(3), 68(9) and 68(10), it is a defence for the person in question to demonstrate that they took all steps reasonably practicable to check that the arrangement is registered and, as a result, they reasonably believe that it is registered. Further details can be found in [chapter 6](#).

76. The offence under 78(1) only applies where the person knows, or having regard to other matters known to them reasonably ought to know, that false, inaccurate or misleading information has been provided. If the person could not have known that the information provided was false, inaccurate or misleading, then they will not commit the offence. The offence would not apply if the information was in the process of being updated within the 14-day window for updating a material change.

# Chapter 13: Interaction between FIRS and other Government measures

77. The requirements of FIRS, the National Security and Investment Act (NSIA), UK strategic export controls, the Academic Technology Approval Scheme (ATAS) and the Register of Consultant Lobbyists are separate and distinct. Registration, or approval, under one of these schemes is not equivalent to compliance with them all.
78. The enhanced tier of FIRS requires registration (but not approval) of arrangements with specified foreign powers or entities to carry out activities in the UK, as well as registration of relevant activities carried out by specified entities.
79. The [National Security and Investment Act](#) 2021 gives the Government powers to scrutinise and intervene in acquisitions in the UK economy, such as business takeovers, to protect national security. As part of this, acquirers must notify and get approval from the Government for certain types of deal involving entities operating in particularly sensitive sectors of the economy.
80. [UK strategic export controls](#) requires those who export or transfer certain types of goods, software or technology to apply for an export licence prior to exporting or transferring them.
81. The [Academic Technology Approval Scheme](#) (ATAS) applies to certain foreign students and researchers, who must obtain ATAS clearance before commencing postgraduate level study or research in sensitive technology-related fields in the UK. The Foreign, Commonwealth & Development Office (FCDO) administers the scheme and issues ATAS certificates.
82. The [Transparency of Lobbying Act 2014](#) requires individuals or organisations to register if they wish to undertake paid consultant lobbying on behalf of any third party. The Registrar of Consultant Lobbyists is an independent office holder who is responsible for keeping and publishing the Register of Consultant Lobbyists and further guidance can be found on the [Office of the Registrar of Consultant Lobbyists website](#).
83. In circumstances where registration or approval is required under multiple schemes, these will need to be processed separately.

# Chapter 14: Exemptions from registration

84. As set out in Schedule 15 of the National Security Act 2023, exemptions from registration on the enhanced tier may apply in the following circumstances.

## Exemption 1: Those who are party to a UK Crown Body arrangement (Schedule 15 paragraph 1)

85. Arrangements do not need to be registered when the United Kingdom is a party to that arrangement. This includes arrangements where any individual acting on behalf of the Crown (for example, a civil servant), or any entity which holds crown status, are a party, including:

- the UK Government,
- a devolved government (including the Scottish, Welsh or Northern Ireland governments),
- a department of the UK or devolved Government (including non-ministerial departments such as the National Crime Agency and Serious Fraud Office),
- a UK or devolved government official.

86. There is also an additional exemption for arrangements to which UK public bodies are a party (see [exemption 6](#)).

87. The exemption only applies when the United Kingdom is an actual party to the **arrangement** with the specified foreign power (for example, if it were a multilateral agreement involving both the UK and the specified foreign power). UK Government involvement in the activities does not mean that the exemption applies, unless the UK Government is also a party to the arrangement.

88. Similarly, where a UK Crown body is only a party to part of an arrangement, the other part of the arrangement would still need registration. For example, where an arrangement with a foreign power has both formalised and informal elements, and the UK Crown body is only party to the formalised element, the informal elements of the arrangement may still require registration if all conditions are met.

## Examples of circumstances where this exemption applies (and does not apply)

**Example 17 (exemption applies):** A foreign state-owned enterprise has been specified on the enhanced tier, with involvement in the development of UK infrastructure constituting a “relevant activity”. A UK government department conducts due diligence into the state-owned enterprise and signs a contract with it for limited involvement in a UK investment project. As a UK government department is party to this arrangement, the state-owned enterprise would not have to register its involvement in this project.

**Example 18 (exemption applies):** The Government of Country Q have been specified under the enhanced tier, with all activities constituting “relevant activities”. The UK is hosting a multilateral conference to which officials from Country Q are invited and the UK Government has arranged with a hotel that all international attendees of the conference can stay. Officials from Country Q book their accommodation directly with the hotel, as per the arrangement with the UK Government. As the UK is a party to the arrangement between the Government of Country Q and the hotel, the hotel is not required to register.

**Example 19 (exemption does not apply):** A facilities management company is a contractor of both a UK Government department and a government department of Country R, which is a specified foreign power. As part of their contract with the specified foreign power, the company hires staff from the UK to manage facilities in Country R. Whilst the company is a contractor of both the UK Government and the specified foreign power, the UK Government is not a party to the arrangement between the company and the specified foreign power, so the exemption does not apply.



**Example 20 (exemption only applies to part of the arrangement):** A UK research institute, together with a UK government department, holds regular discussions with the Ministry of Agriculture of Country S, which has been specified on the enhanced tier, backed up with an MOU. As a result of these discussions, the UK research institute signs a contract with the Ministry of Agriculture of Country S, and is directed to carry out a research project for the Ministry. The UK government department is not a party to that contract, so the exemption does not apply to the contract, even though it would apply to the MOU. Registration of the contract would therefore be required by the UK research institute. It makes no difference whether the UK government department introduced or encouraged the relationship.

## Exemption 2: Foreign powers (Schedule 15 paragraph 2)

89. Foreign powers (as well as their employees and office holders) are not required to register their own activities, providing that they are open and honest about whom they represent (see paragraph 7(2) of Schedule 15 as well as paragraph 2).
90. This exemption does not apply where a person acting for the foreign power makes a misrepresentation about who they are, or the capacity in which they act. A misrepresentation includes where the individual purports to be someone else, represent someone else or be in a role which is different to the one in which they are in. It may be made by making a statement or by any other kind of conduct (including an omission) and may be express or implied. It could also include presenting information in a way which amounts to a misrepresentation, even if some or all of the information is true. This could be the case if, for example, if someone were open that they worked for a foreign power, but did not mention that they were an intelligence officer.
91. A foreign power is defined as any of the following (see section 32 of the National Security Act 2023):
- a) the sovereign or other head of a foreign state in their public capacity,
  - b) a foreign government, or part of a foreign government,
  - c) an agency or authority of a foreign government, or of part of a foreign government,
  - d) an authority responsible for administering the affairs of an area within a foreign country or territory, or persons exercising the functions of such an authority, or
  - e) a political party which is a governing political party of a foreign government.

92. Activities which are carried out directly by UK-based diplomatic missions, consular posts and permanent missions of foreign states to a UK-based international organisation, as well as the official activities of their diplomats and locally engaged staff members, are covered by this exemption.

### Examples of circumstances where this exemption applies (and does not apply)

**Example 21 (exemption applies):** The Ministry of Security of Country T has been specified under the enhanced tier. An employee of that ministry makes an official visit to the UK to engage with UK researchers. Whilst the Ministry of Security has been specified, no registration is required for activities that it carries out itself as a foreign power.

**Example 22 (exemption does not apply):** A covert intelligence officer working for the Government of Country U, which is a specified foreign power, attends a conference in the UK and presents himself as a businessman for a private company. Whilst the officer is employed by a foreign power, as he is not open and honest about the capacity in which he is acting, the exemption does not apply.

### Exemption 3: Spouses, partners and family members of staff of diplomatic missions, consular posts and permanent missions to UK-based international organisations (Schedule 15 paragraph 3(2)-(5))

93. This exemption applies to an individual where **both** conditions A and B are met.

#### Conditions for application of the exemption

**Condition A:** The individual is a member of the family (including an unmarried partner in an enduring family relationship) of a “principal person”.

**Condition B:** The individual makes an arrangement to support the official activities or duties of the principal person.

A “principal person” is a member of staff of a diplomatic mission, consular post or the permanent mission to a UK-based international organisation of a country which is a member of the organisation.

94. This exemption would not apply where the family member makes an arrangement when acting in their personal capacity, or as part of any other work that they carry out which is unrelated to that of the principal person.

### Examples of circumstances where this exemption applies (and does not apply)

**Example 23 (exemption applies):** A consular post in the UK forms part of a foreign government which has been specified under the enhanced tier. The head of the consular post holds a reception which aims to bring together UK academics and academics from their own country. The spouse of a member of staff of the consular post (who also attends the reception) speaks to the UK academics at the reception, seeking to secure collaborative projects with academics from their own country. Whilst the spouse is acting at the direction of a specified foreign power, they are not required to register as an exemption applies.

**Example 24 (exemption does not apply):** The spouse of a member of staff at the UK-based embassy of a specified foreign government is employed as a consultant at a private consultancy firm in the UK. The consultancy firm is contracted by the specified foreign government to provide tourism promotion services targeted at UK nationals, and many of these services are provided by the diplomatic spouse. Whilst the spouse is a partner of a member of staff of a diplomatic mission, she is being directed in her capacity as a consultant (rather than acting to support her diplomatic spouse), so the exemption does **not** apply.

### Exemption 4: Legal activities (Schedule 15 paragraph 6)

95. Where an arrangement with a foreign power or specified entity relates to the carrying out of legal activity by a lawyer, this arrangement will be exempt from registration requirements.

96. Where a lawyer carries out non-legal activity, for example in their personal capacity, this will not benefit from this exemption. Similarly, where an arrangement relates to the carrying out of legal activity by an individual who does not meet the definition of a “lawyer”, the exemption will not apply.

97. A “Lawyer” means (see paragraph 6(3)):

- a) a person who for the purposes of the Legal Services Act 2007 is an authorised person in relation to an activity that constitutes a reserved legal activity (within the meaning of that Act),
- b) a solicitor or barrister in Northern Ireland,
- c) a solicitor or advocate in Scotland, or
- d) a person who is a member, and entitled to practise as such, of a legal profession regulated in a jurisdiction outside the United Kingdom.

98. “Legal activity” means (see paragraph 6(4)):

- a) in England and Wales, a legal activity within the meaning of section 12 of the Legal Services Act 2007,
- b) in Northern Ireland, a legal activity within the meaning of that section, but reading the reference to an activity which is a reserved legal activity as a reference to an activity corresponding to a reserved legal activity,
- c) in Scotland, the provision of legal services within the meaning of section 3 of the Legal Services (Scotland) Act 2010, or
- d) acting as an arbitrator or mediator.

### Examples of circumstances where this exemption applies (and does not apply)

**Example 25 (exemption applies):** A state-owned enterprise, with a regional office in the UK, has been specified on the enhanced tier. The state-owned enterprise contracts a lawyer to represent them in an ongoing court case. Whilst the lawyer is acting at the direction of a specified entity, they are not required to register as they benefit from an exemption.

**Example 26 (exemption does not apply):** The Ministry of Education of Country V, which has been specified under the enhanced tier, meets with a lawyer who is residing in the UK. They direct him to provide information about law degrees in the UK and advice on how to make a successful application to a UK university. Whilst the individual is a lawyer, they are not being directed to carry out legal activities, so the exemption does not apply.

## Exemption 5: Activities that are reasonably necessary for the functioning of a diplomatic mission, consular post or permanent mission to a UK-based international organisation (Schedule 15 paragraph 3(1))

99. Where a person provides goods or services that are reasonably necessary to support the efficient functioning of a diplomatic mission (for example, an embassy), consular post or permanent mission to a UK-based international organisation, this will be exempt from registration. This includes, but is not limited to, activities and services such as:

- Accommodation services (for example, serviced apartments for diplomats);
- Cleaning services;
- Catering services;
- Construction and maintenance services;
- Banking services;
- Insurance services;
- Sale of office equipment;
- Supply of utilities;
- Transport services (for example, taxi services);
- Postal, delivery and shipping services.

100. The exemption only applies where the goods or services being provided are necessary for the functioning of the diplomatic mission, such as where the mission would struggle to operate without them. Contractors and suppliers of diplomatic missions who provide other goods or services (such as hosting events and providing marketing services) do not benefit from the exemption.

### Example of a circumstance where this exemption applies (and does not apply)

**Example 27 (exemption applies):** The Foreign Ministry of Country W has been specified under the enhanced tier. A UK-based embassy, which forms part of the Foreign Ministry of Country W, signs a contract with a UK construction firm for essential maintenance work to the embassy. The construction firm is not required to register, as the arrangement relates to the provision of services which are reasonably necessary for the functioning of a diplomatic mission.

**Example 28 (exemption does not apply):** The Foreign Ministry of Country X has been specified under the enhanced tier. A UK-based embassy, which forms part of the Foreign Ministry of Country X, signs a contract with a public relations (PR) firm. As part of the contract, the PR firm agrees to host an event at which speakers would seek to address recent criticism of repression of the people of Country X by the Government, with a view to changing the narrative about the issue. Whilst the PR firm is in an arrangement with a diplomatic mission, the services that it is providing are not reasonably necessary for the function of the mission.

## Exemption 6: Those who are party to a UK public body arrangement

101. Arrangements do not need to be registered when a UK public body is a party to that arrangement. This includes arrangements where any individual acting on behalf of the UK public body (for example, an employee), is a party. UK public bodies include Scottish, Welsh and Northern Irish public bodies.
102. UK public bodies for the purposes of this exemption are:
  - a. The National Health Service (NHS) including NHS trusts;
  - b. The police (not including police and crime commissioners and the Mayor's Office for policing and crime).
  - c. Other public bodies and offices, which includes a list of individually named non-departmental public bodies. Examples include the Bank of England, the Financial Conduct Authority, UK Research & Innovation and the Environment Agency. A full list of these can be found in Schedule 1 of the Freedom of Information Act 2000.
103. This exemption does not apply to arrangements to which local government public bodies and maintained schools, academy schools and further and higher education institutions are party.
104. The exemption only applies when the UK public body is an actual party to the **arrangement** with the specified foreign power (for example, if it were a multilateral agreement involving both the UK public body and the specified foreign power). The involvement of a UK public body in the activities alone does not mean that the exemption applies.
105. Similarly, where a UK public body is only a party to part of an arrangement, the other part of the arrangement would still need registration. For example, where an arrangement with a foreign power has both formalised and informal

elements, and the UK public body is only party to the formalised element, the informal elements of the arrangement may still require registration if all conditions are met.

106. Even if a UK public body is party to the arrangement, it will be necessary for a person in an arrangement with a foreign power (including a specified foreign power) to register with FIRS where this arrangement involves them being directed to carry out political influencing activity in the UK.

### Examples of circumstances where this exemption applies (and does not apply)

**Example 29 (exemption applies):** A foreign state-owned enterprise has been specified on the enhanced tier, with involvement in the development of UK infrastructure constituting a “relevant activity”. A UK public body signs a contract with it for limited involvement in a UK project. As a UK public body is party to this arrangement, the state-owned enterprise would not have to register its involvement in this project.

**Example 30 (exemption applies):** A public health authority of Country Y has been specified as a foreign power under the enhanced tier, with all activities constituting “relevant activities”. A UK public body is hosting an international public health conference in the UK to which employees of the specified public health authority are invited. The UK public body has arranged with a hotel that all international attendees of the conference can stay. Officials from Country Y’s public health authority book their accommodation directly with the hotel under the arrangement with the UK public body. As the UK public body is a party to the arrangement between Country Y’s public health authority and the hotel, the hotel is not required to register.

**Example 31 (exemption does not apply):** A facilities management company is a contractor of both a UK public body and a government department of Country Z, which is a specified foreign power. As part of their contract with the specified foreign power, the company hires staff from the UK to manage facilities in Country Z. Whilst the company is a contractor of both the UK public body and the specified foreign power, the UK public body is not a party to the arrangement between the company and the specified foreign power, so the exemption does not apply.

**Example 32 (exemption only applies to part of the arrangement):** A UK public body, together with a private UK technology company, holds regular discussions with the Ministry of Agriculture of Country A, which has been specified on the enhanced tier, backed up with an MOU. As a result of these discussions, the UK technology company signs a contract with the Ministry of Agriculture of Country A, and is directed to carry out a research project. The UK public body is not a party to that contract, so the exemption does not apply to the contract, even though it would apply to the MOU. Registration of the contract would therefore be required by the UK technology company. It makes no difference whether the UK public body introduced or encouraged the relationship.

## Exemption 7: Funded Education Arrangements

107. Where someone is in an arrangement with a specified foreign power where the foreign power is providing them with financial assistance while they are completing a course of further or higher education in the UK, they will not need to register where they are being directed by that foreign power to carry out activities that are reasonably necessary to:
- a. Complete the course of education;
  - b. Uphold the reputation of the provider of the financial assistance or the education;
  - c. Meet the standards of conduct reasonably expected by the provider of the financial assistance or the education; or
  - d. Notify any person of personal information such as their contact details, information required to monitor their progress towards completing their education etc.
108. Where someone providing higher or further education is in an arrangement with a specified foreign power to facilitate an arrangement detailed in the paragraph above, that person is also exempt from registering with FIRS.
109. Just because someone is in an exempt education arrangement, does not mean that they are exempt from registering any arrangement with FIRS. For example, where someone in an exempt scholarship arrangement is directed by a specified foreign power or foreign power-controlled entity to conduct activity that falls outside of the activity covered by the exemption, such as organising a protest at a university campus in the UK, they will have to register this with FIRS.



110. Many conditions within a scholarship arrangement which do not explicitly require the student to undertake an activity in the UK but are more general, are not registerable with FIRS e.g. obey the guidance and management of the student's embassy while overseas. However, if the student was subsequently directed to undertake an activity, which they were compelled to do by virtue of an existing condition of their scholarship which is not captured by the exemption, this would be registerable". For example, if a specified foreign embassy were to direct a student in receipt of a scholarship to collect personal details about their fellow students and report these to the embassy, this would be registerable.
111. The [Academic Technology Approval Scheme](#) (ATAS) applies to certain foreign students and researchers, who must obtain ATAS clearance before commencing postgraduate level study or research in sensitive technology-related fields in the UK. The Foreign, Commonwealth & Development Office (FCDO) administers the scheme and issues ATAS certificates. Where a student needs an ATAS certificate before starting a course that is covered by a scholarship arrangement, the scholarship exemption above will only apply if an ATAS certificate has been obtained before they start that course.

### Example of circumstances where this exemption applies (and does not apply)

**Example 33 (exemption applies):** The Ministry of Education of Country B has been specified under the enhanced tier. A student enters into an arrangement with the Ministry of Education of Country B where they receive funding to complete a university degree in the UK. As part of the conditions of this funding, they are directed to carry out a number of activities in the UK including attending classes at the UK university and providing an annual update to the foreign power on the progress of their course. The student does not need to register this arrangement with FIRS.

**Example 34 (exemption applies):** The Ministry of Education of Country C has been specified under the enhanced tier. They send 7 students from the country of the specified foreign power to a UK university to study. The Ministry of Education of Country C directs the UK university to send an annual report on the students' academic progress. The UK university does not need to register this arrangement with FIRS so long as its purpose was to facilitate an arrangement for providing financial support to the students.

**Example 35 (exemption does not apply):** The Ministry of Education of Country D has been specified under the enhanced tier. A student enters into an arrangement with the Ministry of Education of Country D where they receive funding to complete a university degree in the UK. 2 years into their course, the student is contacted by the Ministry of Education of Country D and directed to organise a protest on the campus of their UK university promoting the foreign policy of Country D. Whilst the student is not required to register the funding arrangement for their studies, they are required to register the direction to organise a protest.

## Exemption 8: Government Administrative and Technical Services

112. A person does not need to register an arrangement where they are directed by a specified foreign power to carry out activity in the UK that is reasonably necessary to facilitate the provision of the following services by or on behalf of the specified foreign power:
- a. consular functions including but not limited to issuing passports or travel documents to the nationals of a specified foreign power, notarisation and registration services (including registration of births, deaths and marriages and providing or arranging for assistance to be provided in emergency circumstances, such as serious injury or illness);
  - b. immigration and citizenship services and;
  - c. tax administrative services such as advice or assistance on paying tax owed to the specified foreign power or complying with any other legal requirements relating to tax.
113. A person is only exempt from registering with the scheme where they are directed to carry out activity that is reasonably necessary to enable the provision of a service covered by the exemption. For example, if an individual is directed to fill in a passport application form by the specified foreign power as part of the process of applying for or renewing a passport, this does not to be registered with FIRS. However, if while applying for a passport, they were directed by the specified foreign power to provide the names and addresses of the employees of the individual's company, this would not be exempt and should be registered with FIRS.

**Example of circumstances where this exemption applies (and does not apply)**

**Example 36 (consular services) (exemption applies):** An individual wishes to travel to Country E for a holiday. The Government of Country E has been specified on FIRS. The individual must acquire a tourist visa to visit Country E and must complete a visa application process at Country E's embassy in the UK. As part of the visa application service, Country E's embassy instructs the individual to submit a passport photo and undertake a medical examination.

Submitting a passport photo and undertaking a medical examination are reasonably necessary to support a visa application process and a reasonable direction by the embassy. As a result, the individual does not need to register this arrangement with FIRS.

**Example 37 (immigration and citizenship services) (exemption does not apply):** An individual wishes to obtain citizenship with Country F. Country F has been specified on FIRS. The individual must therefore make an application to Country F's Embassy in the UK to obtain citizenship. Country F's embassy instructs the individual to submit documents as part of the citizenship application process which includes a criminal records' check and copies of their UK based employer's commercial contracts.

Whilst the request for a criminal records check is reasonably necessary to support a citizenship application process, asking for copies of the individual's current employer's commercial contracts is not. Therefore, this aspect of the arrangement would need to be registered with FIRS.

**Example 38A (tax administrative services) (exemption applies):** A UK health business has regular commercial activity and engagement with a business (business X) which is headquartered in Country G. Business X is not specified under FIRS, but Country G's Ministry of Finance is specified.

As part of ongoing commercial engagements, the UK business is legally obliged to pay tax to Country G's Ministry of Finance. The UK business gets in contact with Country G's Ministry of Finance. The Ministry of Finance directs the UK business to complete and submit a tax assessment form. The application forms asks for information that is considered reasonable and within scope of the administrative process. The UK business does not need to register this arrangement with FIRS.

**Example 38B (tax administrative services) (exemption does not apply):** A UK health business has regular commercial activity and engagement with a business (business X) which is headquartered in Country G. Business X is not specified on FIRS, but Country G's Ministry of Finance is specified.

As part of ongoing commercial engagements, the UK business is legally obliged to pay tax to Country G's Ministry of Finance. The UK business gets in contact with Country G's Ministry of Finance. The Ministry of Finance directs the UK business to complete and submit a tax assessment form. The Ministry also asks for detailed information about the UK business' research and development department including ongoing medical research.

Since the Ministry has asked for information that is outside the scope of tax assessment, by asking for medical research data, this activity should be registered with FIRS.

## Annex A: Table of examples

The below table sets out all of the examples included in the above guidance, including whether registration is required or not and which of the relevant conditions are met.

Example	Summary	Conditions met				Registration required
		1	2	3	4	
<b>Chapter 7 (general examples)</b>						
1	Influencer in arrangement with a specified foreign power-controlled entity to produce videos.	Yes	Yes	Yes	Yes	Yes
2	Printing and reprographics firm in arrangement with a specified foreign power to produce leaflets.	Yes	Yes	Yes	Yes	Yes
3	Airline in an arrangement with a specified foreign power to introduce a new flight route between the UK and Country C.	Yes	Yes	Yes	Yes	Yes
4	Company funded by a specified foreign power to carry out networking and collaboration events in the UK.	Yes	Yes	Yes	Yes	Yes
5	Entrepreneur in an arrangement with a specified foreign power to promote cultural programmes.	Yes	Yes	Yes	Yes	Yes
6	Businessman in an arrangement with a specified foreign power to approach experts and invite them to a future event.	Yes	Yes	Yes	Yes	Yes
7	National of Country G in an arrangement with a specified foreign power to organise a demonstration in the UK.	Yes	Yes	Yes	Yes	Yes

8	Human rights organisation being directed to cancel a speech by an opposition politician of Country H.	Yes	Yes	Yes	Yes	Yes
9	Consultant in an arrangement with an agency of a specified foreign government to promote tourism to the country.	Yes	Yes	Yes	Yes	Yes
10	Ordinary national of Country J, whose Government has been specified, engaging with UK academics.	No	No	Yes	Yes	No
11	Charity receiving donations from a specified foreign power, but without being directed to use it in a specific way.	Yes	No	Yes	Yes	No
12	UK company in an arrangement with a state-owned enterprise of a country whose Government has been specified.	No	No	Yes	Yes	No
<b>Chapter 10 (state-owned enterprises)</b>						
13	Board members of a specified foreign power directing a state-owned enterprise to work with a UK company to install fibre optic cables.	Yes	Yes	Yes	Yes	Yes
14	Employee of a state-owned enterprise buying a new printer for UK office.	Yes	No	Yes	Yes	No
<b>Chapter 11 (partnerships with state-owned enterprises)</b>						
15	Coffee production company from a country whose government has been specified marketing its products in the UK through a consultant.	No	No	Yes	Yes	No
16	Consultant marketing products at the direction of a specified foreign power-controlled entity.	Yes	Yes	Yes	Yes	Yes

Chapter 14 (exemptions)						
17	“UK arrangement” exemption applies as the UK Government has signed a contract for the involvement of a specified foreign power-controlled entity in a UK infrastructure project.	Yes	Yes	Yes	No	No
18	“UK arrangement” exemption applies as the UK Government is party to an arrangement between a hotel and a specified foreign power.	Yes	Yes	Yes	No	No
19	Facilities management company in separate arrangements with the UK Government and the government of a specified foreign power, meaning that the “UK arrangement” exemption does not apply.	Yes	Yes	Yes	Yes	Yes
20	Research institute in a contractual arrangement with a foreign power, separately to the wider MOU arrangement which the UK Government is a party to.	Yes	Yes	Yes	Yes	Yes
21	Employee of a specified ministry engaging with researchers in the UK; exemption for foreign powers applies.	Yes	Yes	Yes	No	No
22	Officer of a specified foreign power acting under a misrepresentation, meaning that the foreign power exemption does not apply.	Yes	Yes	Yes	Yes	Yes
23	Spouse of a diplomat engaging with academics at an official reception hosted by the diplomatic mission;	Yes	Yes	Yes	No	No

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	exemption for diplomatic family members applies.					
24	Spouse of a diplomat in an arrangement with a specified foreign power in her capacity as a consultant rather than as part of the official duties of the diplomat, meaning that the exemption for diplomatic family members does not apply.	Yes	Yes	Yes	Yes	Yes
25	Lawyer representing a specified foreign power-controlled entity in a court case; exemption for lawyers carrying out legal activities applies.	Yes	Yes	Yes	No	No
26	Lawyer carrying out non-legal activities for a specified foreign power, meaning that the exemption for lawyers carrying out legal activities does not apply.	Yes	Yes	Yes	Yes	Yes
27	Construction firm providing maintenance services for a diplomatic mission of a specified foreign power; exemption applies.	Yes	Yes	Yes	No	No
28	PR firm hosting an event for a diplomatic mission of a specified foreign power; exemption does not apply as the activity is not necessary for the efficient functioning of the mission.	Yes	Yes	Yes	Yes	Yes
29	Public body in an arrangement with a specified state-owned enterprise related to a UK infrastructure project; exemption for public bodies applies.	Yes	Yes	Yes	No	No



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30	UK hotel providing accommodation for employees of a specified foreign power, but a UK public body is party to the arrangement.	Yes	Yes	Yes	No	No
31	Facilities management company in separate arrangements with a UK public body and the specified foreign power, meaning that the UK public bodies exemption does not apply.	Yes	Yes	Yes	Yes	Yes
32	Private technology company in a contractual arrangement with a foreign power, separately to the wider MOU arrangement which a UK public body is a party to.	Yes	Yes	Yes	Yes	Yes
33	Student provided funding by a specified foreign power to carry out study and related activities in the UK; exemption for scholarship arrangements applies.	Yes	Yes	Yes	No	No
34	UK university receiving students employed by a specified foreign power and providing updates on their progress; exemption for scholarship arrangements applies.	Yes	Yes	Yes	No	No
35	Student on a scholarship programme is directed by a specified foreign power to organise a protest.	Yes	Yes	Yes	Yes	Yes
36	Individual is directed by a specified foreign power to provide information to support their visa application; exemption for	Yes	Yes	Yes	No	No

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	government administrative processes applies.					
37	Individual applying for citizenship is directed by a specified foreign power to provide information unrelated to their citizenship application.	Yes	Yes	Yes	Yes	Yes
38A	UK business is directed by a specified foreign power to provide information related to its tax return; exemption for government administrative processes applies.	Yes	Yes	Yes	No	No
38B	UK business is directed by a specified foreign power to provide information unrelated to its tax return.	Yes	Yes	Yes	Yes	Yes

